

AUG 27 2020

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ASHLEE BARCELLO,
JAIPUR HOWARD, and
JOSEPHUS HOWARD,

Defendants.

No.

4:20CR00433 MTS/PLC

INDICTMENT

The Grand Jury charges:

COUNT 1

(Access Device Fraud)

From on or about November 17, 2018, until December 19, 2018, within the Eastern District of Missouri, the defendant,

ASHLEE BARCELLO,

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, an unauthorized access device, that being a credit card belonging to KH and ending in 4765, to obtain merchandise and gift cards with an aggregate value exceeding \$1,000.00, that is: stolen credit and debit cards;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT 2

(Access Device Fraud)

From on or about November 17, 2018, until December 19, 2018, within the Eastern District of Missouri, the defendant,

JAIPUR HOWARD,

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that being credit cards belonging to R.E. and S.H. ending in 5907 and 2233, respectively, to obtain merchandise and gift cards with an aggregate value exceeding \$1,000.00, that is: stolen credit and debit cards;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNT 3
(Access Device Fraud)

From on or about November 17, 2018, until December 19, 2018, within the Eastern District of Missouri, the defendant,

JOSEPHUS HOWARD,

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that being credit cards belonging to S.H. and ending in 1391 and 4981, to obtain merchandise and gift cards with an aggregate value exceeding \$1,000.00, that is: stolen credit and debit cards;

In violation of Title 18, United States Code, Sections 1029(a)(2), (b)(1), and 2.

COUNTS 4-5
(Aggravated Identity Theft)

On or about December 1, 2018, in the Eastern District of Missouri, the defendant,

ASHLEE BARCELLO,

did knowingly possess, transfer, and use, without lawful authority, a means of identification, that being the name and account number ending in 4765 of K.H., during and in relation to the commission of the felony offenses of: access device fraud, Title 18, United States Code, Section 1029(a)(2), and bank fraud, Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS 6-8
(Aggravated Identity Theft)

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

JAIPUR HOWARD,

did knowingly possess, transfer, and use, without lawful authority, the name and account number of the following individuals, during and in relation to the commission of the felony offenses of: access device fraud, Title 18, United States Code, Section 1029(a)(2), and bank fraud, Title 18, United States Code, Section 1344:

COUNT	DATE	IDENTITY	ACCOUNT NUMBER
6	November 17, 2018	A.H.	Card Ending 4639
7	November 17, 2018	R.E.	Card Ending 5907
8	December 17, 2018	S.H.	Card Ending 2233

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS 9-11
(Aggravated Identity Theft)

On or about the dates listed below, in the Eastern District of Missouri, the defendant,

JOSEPHUS HOWARD,

did knowingly possess, transfer, and use, without lawful authority, the name and account number of the following individuals, during and in relation to the commission of the felony offenses of: access device fraud, Title 18, United States Code, Section 1029(a)(2), and bank fraud, Title 18, United States Code, Section 1344:

COUNT	DATE	IDENTITY	ACCOUNT NUMBER
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9	December 7, 2018	C.O.	Card Ending 5520
10	December 17, 2018	S.H.	Card Ending 1391
11	December 17, 2018	S.H.	Card Ending 4981

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS 12-14
(Bank Fraud)

A. FINANCIAL INSTITUTIONS

1. At all times relevant to the indictment, Central Bank of St. Louis and First Community Credit Union were financial institutions insured by the federal government through the Federal Deposit Insurance Corporation and the National Credit Union Association.

B. THE SCHEME TO DEFRAUD

2. Between on or about December 6, 2018, and December 19, 2018, within the Eastern District of Missouri, the defendant,

ASHLEE BARCELLO,

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally-insured financial institutions by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that the defendant obtained stolen checks and forms of personal identification of other individuals from vehicle break-ins without their knowledge or consent;

- b. It was further part of the scheme and artifice to defraud that the defendant presented the stolen checks and forms of personal identification of other individuals to financial institutions;
- c. It was further part of the scheme and artifice to defraud that after presentation of the stolen checks and forms of personal identification of other individuals, the defendant induced, or attempted to induce, the financial institutions to issue cash to the defendant; and
- d. It was further part of the scheme and artifice to defraud that the defendant caused, or attempted to cause, losses to the financial institutions by using the fraudulently obtaining checks and forms of personal identification of other individuals to obtain cash.

C. The Financial Transactions

4. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

ASHLEE BARCELLO,

executed and attempted to execute the scheme and artifice as set forth above, in that, **ASHLEE BARCELLO** made false statements to the federally insured financial institutions listed below and submitted fraudulently obtained identification documents in order to obtain cash:

COUNT	DATE	IDENTITY	FINANCIAL INSTITUTION
12	December 6, 2018	K.H.	First Community Credit Union
13	December 19, 2018	A.C.	Central Bank of St. Louis-Chesterfield
14	December 19, 2018	A.C.	Central Bank of St. Louis-Wildwood

All in violation of Title 18, United States Code, Section 1344 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds probable cause that:

- 1. Pursuant to Title 18, United States Code, Sections 982(a) and Title 28, United States

Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1343 as set forth in Count(s) I-V, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violations.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

ANTHONY BOX #58575 MO
Assistant United States Attorney